Bluspring

RISK MANAGEMENT POLICY

The policy was adopted by the Board on April 1, 2025

1. **Legal Framework**

Risk Management is a key aspect of the Corporate Governance Principles which aims to improve the governance practices across activities of Bluspring Enterprises Limited. Risk Management Policy and processes will enable to proactively manage uncertainty and changes in the internal and external environment to limit any negative impact and also capitalize on opportunities. For the purposes of this policy, references to Bluspring Enterprises Limited mean Bluspring Enterprises Limited and all of its subsidiaries.

2. **Objective**

The main objective of this policy is to ensure sustainable business growth with stability and to promote a pro-active approach in reporting, evaluating and resolving risks associated with the business. In order to achieve the key objective, the policy establishes a structured and disciplined approach to Risk Management, in order to guide decisions on risk related issues.

The specific objectives of the Risk Management Policy are:

1. To ensure all current and future material risk exposures of the Company are identified, assessed, quantified, appropriately mitigated, minimized and managed effectively.
2. To establish a risk management framework for the Company and ensure its implementation.
3. To enable compliance with applicable regulations, through adoption of best practices.
4. To assure financial stability in business.
5. To ensure integration in reporting, controlling and planning procedures, centralized risk co-ordination, development of risk behavior, continuous risk assessment and responsiveness to changes.

3. **Definitions:**

"Audit Committee"- means Committee of Board of Directors of the Company constituted under Section 177 of the Companies Act, 2013 and the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

"Board of Directors" or "Board"- in relation to a Company, means the collective body of Directors of the Company as per section 2(10) of the Companies Act, 2013.

"Policy"- means Risk Management Policy.

4. Disclosures required under Companies Act, 2013 and SEBI (LODR) Regulations, 2015

(i) As per the provisions of Section 134(3)(n) of the Companies Act, 2013, the Company shall include a statement indicating development and implementation of a risk management policy for the Company including identification therein of elements of risk, if any, which in the opinion of the Board may threaten the existence of the Company.

(ii) As per the provisions of Section 177(4)(vii) of the Companies Act, 2013, the Company shall include evaluation of internal financial controls and risk management systems in accordance with the terms of reference of Audit Committee.

(iii) As required under Regulation 21 of the SEBI (LODR) Regulations, 2015, the Company shall comply with the composition, role and frequency of the meetings, of the Risk Management Committee.

Broad Principles:

1.1 The Risk Management Committee shall evaluate significant risk exposures of the Company and assess management's actions to mitigate the exposures in a timely manner (including one-off initiatives, and ongoing activities such as business continuity planning and disaster recovery planning & testing).

1.2 The Risk Management Committee will coordinate its activities with the Audit Committee in instances where there is any overlap with audit activities (e.g. internal or external audit issue relating to risk management policy or practice).

1.3 The Risk Management Committee shall make regular reports/ recommendations to the Board.

1.4 To formulate a detailed risk management policy which shall include:

i. A framework for identification of internal and external risks specifically faced by the listed entity, in particular including financial, operational, sectoral, sustainability (particularly, ESG related risks), information, cyber security risks or any other risk as may be determined by the Committee.

ii. Measures for risk mitigation including systems and processes for internal control of identified risks.

iii. Business continuity plan.

1.5 To ensure that appropriate methodology, processes and systems are in place to monitor and evaluate risks associated with the business of the Company.

1.6 To monitor and oversee implementation of the risk management policy, including evaluating the adequacy of risk management systems.

1.7 To periodically review the risk management policy, at least once in two years, including by considering the changing industry dynamics and evolving complexity.

1.8 To keep the Board of Directors informed about the nature and content of its discussions, recommendations and actions to be taken.

The Risk Management Committee shall coordinate its activities with other committees, in instances where there is any overlap with activities of such committees, as per the framework laid down by the Board of Directors.

This Policy will be communicated to all concerned persons of the Company and shall be placed on the website of the Company.

The Risk Management Committee shall have access to any internal information necessary to fulfill its oversight role. The Risk Management Committee shall also have authority to obtain advice and assistance from internal or external legal, accounting or other advisors.